

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

PATRICK NEARY,

Plaintiff,

Case No.: 2:22-cv-12267

v.

KEY LAKES, INC. and/or KEY LAKES IV, INC.
And/or KEYSTONE SHIPPING CO.,

Defendant.

_____ /

COMPLAINT

NOW COMES Plaintiff, Patrick Neary, by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.

2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and under the General Maritime Law for unseaworthiness, maintenance and cure.

3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crewmember aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.

4. On or about April 24, 2020, Plaintiff was hosing with multiple hoses coupled together thus creating a snagging hazard. When same snagged, he was injured while trying to yank it free to which failure to provide a safe place to work and seaworthy vessel could have been remedied by having hose spickets in the area in which to connect the shortee hoses.

5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages, *inter alia*, as follows:

- a. Pain and suffering, past future;
- b. Mortification, humiliation, fright shock and embarrassment;
- c. Loss of earnings and earning capacity;
- d. Hospital, pharmaceutical and other cure expenses;
- e. Aggravation of prior condition, if any there be;
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed;
- g. Mental anguish;
- h. Found;
- i. Maintenance, cure, and/or attorney fees.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

DENNIS M. O'BRYAN (P30545)

Attorneys for Plaintiff

401 S. Old Woodward, Suite 463

Birmingham, MI 48009

248.258.6262, 248.258.6047

dob@obryanlaw.net

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

PATRICK NEARY,

Plaintiff,

Case No.: 2:22-cv-12267

v.

KEY LAKES, INC. and/or KEY LAKES IV, INC,
And/or KEYSTONE SHIPPING CO.,

Defendant.

_____ /

DEMAND FOR TRIAL BY JURY

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, and hereby demands trial by jury in the above-referenced cause of action.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

DENNIS M. O'BRYAN (P30545)

Attorneys for Plaintiff

401 S. Old Woodward, Suite 463

Birmingham, MI 48009

248.258.6262, 248.258.6047

dob@obryanlaw.net